

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

RECEIVED CLERK'S OFFICE

Joseph Lee Wood

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Sean Keefer, ^{JW}
Jessica Means ^{JW}
~~and others~~ DSS Berkeley County

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

2016 JUN 10 A 8:59

Complaint for a Civil Case

DISTRICT COURT
DISTRICT OF SOUTH CAROLINA,
COLUMBIA, SC

Case No. 2:16-CV-1897-DCN-BM

(to be filled in by the Clerk's Office)

Jury Trial: Yes No
(check one)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Joseph Lee Wood</u>
Street Address	<u>198 Triverse Rd Apt 7</u>
City and County	<u>Moncks Corner (Berkeley)</u>
State and Zip Code	<u>Moncks Corner SC 29461</u>
Telephone Number	<u>843-609-9111</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Sean Keefer, Esquire</u>
Job or Title (if known)	<u>Atty, Guardian ad Litem</u>
Street Address	<u>1643 B Savannah Hwy Ste 226</u>
City and County	<u>Charleston SC 29407 (Charleston)</u>
State and Zip Code	<u>Charleston SC 29407</u>
Telephone Number	<u>843-364-3341</u>

Defendant No. 2

Name	<u>Morgan Morrison</u>
Job or Title (if known)	<u>Attorney</u>
Street Address	<u>1643 B Savannah Hwy Ste 226</u>
City and County	<u>Charleston SC 29407 (Charleston)</u>
State and Zip Code	<u>Charleston SC 29407</u>
Telephone Number	<u>843-364-3341</u>

Defendant No. 3

Name	<u>Jessica Means</u>
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Job or Title
 (if known) Attorney
 Street Address 1816 Belgrade Ave Suite 101
 City and County Charleston (Charleston)
 State and Zip Code SC 29407
 Telephone Number 843-654-4470
 Defendant No. 4
 Name John Blackmon (JW)
 Job or Title
 (if known) Defender
 Street Address PO Box 1611 Columbia SC 29204 (JW)
 City and County Moncks Corner (JW)
 State and Zip Code SC 29436 (JW)
 Telephone Number 843-777-1870 (JW)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Main Complaint: Discrimination on the basis of gender:
 I have attempted through the court system to (Male)
 protect my son Amari from suspected Sexual
 Abuse. A guardian ad litem was appointed. My
 son was in the care of the primary Caregiver, Quintel Reid,
 and I was assigned visitation. My complaint is that
 my civil rights were violated in the sense that
 evidence showed and presented to the guardian
 ad Litem Sean Keefer, of Agencies such as
 LowCountry
 Childrens
 Center,

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

JW
 Amari

① Would like my family court case to be reheard by a different judge. ② Keefer: Refund of monies paid in the amt of \$1700.00 due to mishandling and neglect of my case. Removed as a Guardian ad Litem for not presenting evidence crucial to the case. ③ Misrepresentation of monies received.

Also- Keefer- Dismissal of \$13500 Fee court-ordered to Mr. Keefer

✓ (JW) ~~plaintiff has no evidence to prove presentation of key evidence regarding my son Amari. Mishandling or not presenting key evidence crucial to my case (see attached)~~ Amari masturbating on a regular basis, administration of Quillivant for ADHD in which the primary caregiver did not give to see attached

(Continued) - Statement of claim
My son on a regular basis.

① Sean Keefer, appointed Guardian ad Litem did not protect my child in that he paid no immediate attention to the report [redacted] made to DSS [redacted] for sexual abuse and medical neglect. Sean Keefer, appointed Guardian ad Litem did not protect my child by enforcing that Amari, my son, would keep his appointment with Dr. Daniels, a Child psychologist who could adequately diagnose ADHD. Sean Keefer, appointed Guardian ad Litem made one visit to observe Amari at school within a one year period. When making his report to Judge Landis Mr. Keefer did not lay out all the facts:
① Amari [redacted] suffered a burn on his arm, masturbating on a regular basis, blisters and scars around the rectal area, etc.

(JW
2)

Jessica Means, attorney for primary caregiver, Quintell Reid.

Jessica Means demand that I pay for Ms. Reid's court costs although I was never married to Ms. Reid.

Ms. Reid and Mr. Mixson both were concerned about receiving money from me and they both were told to go into chambers during Family Court. I was not made privy to the exact conversation, but my lawyer Mr. Mixson told me that it would do no good to try to present evidence to this judge so he just gave into the judge but was quick to charge me ~~\$1000.00~~ \$2000.00.

(5w) Dept. of Social Services, Berkeley County

When a call was made to report suspected child abuse/medical neglect, the case was accepted. A caseworker was assigned to investigate. A visit was made to primary caregiver's home, Quintel Reid, who is also a DSS Caseworker. The Caseworker assigned, Austin Cummins, reports that he found no evidence of child abuse/medical neglect. Mr. Cummins has the same job title as the primary caregiver, Quintel and I think there was a bias presentation in favor of primary caregiver, Quintel Reid. I blame the Dept of Social Services for not protecting my son, Amari.

Continued: Relief

(JW) Plaintiff demands her attorney fees and costs for services provided to her in this case. Plaintiff demands that the Defendants acknowledge and apologize for their conduct in this case. Plaintiff demands that the Defendants pay her attorney fees and costs for services provided to her in this case.

- 2) Jessica Means - Dismissal of a \$6,000 fee court-ordered to the defendant's attorney for fees.
- 3) DSS Berkeley County - Mishandling and/or neglect to act properly toward the complainant involving medical neglect and sexual abuse in the case involving my son, Amari.

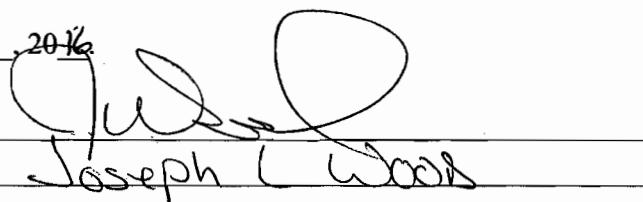
V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6-2 2016



Signature of Plaintiff

Printed Name of Plaintiff

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address
